

ATTACHMENT 1

FILED/REC'D

2022 MAY 17 P 2:13

COMPLAINT FORM

(For non-prisoner filers without lawyers)

CLERK OF COURT
U.S. DISTRICT COURT
WD OF WI

IN THE UNITED STATES DISTRICT COURT FOR THE Western
DISTRICT OF Wisconsin

(Full name of plaintiff(s))

Russell Ortiz

vs

Case Number:

22 CV 277 WMC

(Full name of defendant(s))

(To be supplied by clerk of court)

Shop bop LLC c/o Amazon@littler.com

A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at
(State)

2602 Country Rose Ct 15 Madison WI
53713
(Address)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant Shop bop LLC c/o
Amazon@littler.com

(Name)

is (if a person or private corporation) a citizen of

WI

(State, if known) and (if a person) resides at 1301 Washington

AV Madison WI 53703

(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for _____

(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and 5. Why they did it, if you know.

Shopbop LLC with reckless indifference continuously violated my civil rights under Title VII while I was its employee. The violations occurred during the period of April 14 through April 19th 2021 while working as a Warehouse Associate in coincidence after I took a leave of absent in relation to Covid-19 laws established by Governor Evans in which I was paid unemployment compensation after filing a claim with the Work Development Department and complained about Shopbop's denying of employee rights under the then covid state law about open only essential business mandates.

The defended violated my civil right by not firing or taking any reprehensible actions against an employee who provoked me and bullied me with racial slurs. A shift manager was a witness and refused to fire the employee at the spot. The defendant violated my civil rights by not following up and by ignoring my requests for justice and accountability with reckless indifference after personal conversations, emails and calls made by me after I reported the incident. I was forced to work under the same roof and schedule with the employee who violated me. I exhausted all resources available at my disposal through all shift and senior management level personnel, all HR domestic and out of state (HR Employee Line personnel and even after talking and filing a case through their own Amazon's Ethic Line 24hrs service. The defendant also with reckless indifference retaliated against me after I reported the incident by asking me to accept lesser hours and a different position at a different location which was another violation to my civil rights.

After realizing that I was being lied to and after exhausting all channels and not being able to sleep out of humiliation, frustration, depression and overall discomfort and suffering; I decided to resigned on April 19th 2021 around 4:03am through its HR Employee Line.

Evidence of email conversations with reckless indifference from part of the defendant are available as well as a recording of a meeting with a domestic lead senior manager in which I asked for immediate help and it was denied. Also, a recorded conversation with HR where I also plea for immediate help while explaining what happened to me at work and once again immediate help is denied.

This is a summary of an approximately 8 pages complaint document submitted to the Work Force Development Office by me with its correspondent recordings, email and imaging evidence and with very detail written information about the order of events that took place. Please refer to these pages for more information. Also, included is the decision form the judge at the Work Force Development Department in regards to this case.

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

I respectfully would like a judgment for payment to the plaintiff totaling 10 percent of the defendant's wealth for 2021 [the year of violations] in order to establish a fair deterrence that covers punitive damages for reckless indifference, compensatory damages for personal suffering and retaliation, wages lost for year 2021, and all attorney(s) and courts filing fees associated with this lawsuit.

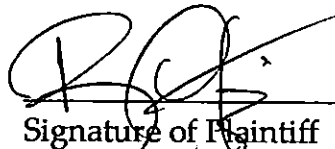
Order the defendant to establish sound procedures to avoid future violations and to take disciplinary steps towards managers involved in this incident.

E. JURY DEMAND

- ☒ Jury Demand - I want a jury to hear my case
OR
☐ Court Trial - I want a judge to hear my case

Dated this 17th day of May 2022.

Respectfully Submitted,


Signature of Plaintiff

608-888-3945

Plaintiff's Telephone Number

russoiriz2@gmail.com

Plaintiff's Email Address

2602 Country Road Ct. 15

Madison, WI 53713

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE
FILING FEE**

☒ I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

☐ I DO **NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.